

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

GEORGE A. JACKSON, et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	C. A. No. 05-823-***
	)	
STANLEY TAYLOR, et al.,	)	JURY TRIAL REQUESTED
	)	
Defendants.	)	

**DEFENDANT STEVEN RAYNER'S RESPONSE TO PLAINTIFF'S REQUEST  
FOR ADMISSIONS**

Pursuant to Federal Rule of Civil Procedure 36, Defendant Steven Rayner responds to Plaintiff's Request for Admissions as follows:

1. Heating, ventilation, and air condition (HVAC) related processes designed to regulate ambient conditions within buildings for comfort or for industrial purposes.

**RESPONSE:** Answering Defendant has no knowledge.

2. Heating an area raises temperature in a given space to a more satisfactory level than that of the atmosphere.

**RESPONSE:** Objection. Defendant does not understand what is meant by the term "satisfactory." Without waiving this objection, it is denied.

3. Ventilation, either separately or in combination with the heating or air condition system controls both the supply and exhaust of air within given areas in order to provide sufficient oxygen to the occupants and to eliminate odors.

**RESPONSE:** Answering Defendant has no knowledge.

3. Air conditioning designates control of the indoor environment year round to create and maintain desirable temperature, humidity, [sic] air circulation, and purity for the occupants of that space or for the industrial materials that are handled or stored there.

**RESPONSE:** Answering Defendant has no knowledge.

4. Plaintiffs' complaint alleges inadequate ventilation and air flow on the "old side" of the SCI main kitchen, especially during summer months.

**RESPONSE:** Admitted.

5. During the filing of the George A. Jackson's "emergency grievance" on July 19, 2005, the "old-side" SCI main kitchen was operating with eight (8) commercial size convectional ovens, four (4) commercial size conventional ovens, two (2) commercial size cooking braisers, one large flat top grill, and a six (6) burner pilot stove.

**RESPONSE:** Defendant is without sufficient knowledge to admit or deny the allegation.

6. All the above commercial size appliances on the "old-side" main kitchen at SCI, have a caution plate stamp on the back of each appliances [sic] to not install unless under a [sic] exhaust hood system.

**RESPONSE:** Answering Defendant has no knowledge.

7. During cold winter temperatures in the SCI main kitchen, inmate workers are not issued thermal wear, nor are they allowed to wear adequate winter clothes in the food preparation/production area.

**RESPONSE:** Objection. Defendant does not understand what is meant by the term "adequate." Without waiving this objection, it is denied.

8. Plaintiffs original and amended complaints alleges [sic] that "contaminated food being sent out to the prison population."

**RESPONSE:** Admitted.

9. On July 20, 2005, contaminated food was reported to the Food Service staff at the SCI main kitchen pertaining to beef cube steak.

**RESPONSE:** Defendant is without sufficient knowledge to admit or deny the allegation.

10. Sample of beef cube steak that was prepare [sic] from the July 20<sup>th</sup>, 2005 meal was forward to Michael Knight, Food Services Administrator.

**RESPONSE:** Defendant is without sufficient knowledge to admit or deny the allegation.

11. Sample beef cube steak were [sic] discovered to be contaminated with larva.

**RESPONSE:** Defendant is without sufficient knowledge to admit or deny the allegation.

12. The SCI main kitchen have east and west alcove doors.

**RESPONSE:** Admitted.

13. Prior to July 2005, the SCI main kitchen east and west alcove doors were not self closing doors.

**RESPONSE:** Admitted.

14. Fomer [sic] inmate kitchen worker Joshua Hudson suffered a serious injury to his fingers when one of the SCI main kitchen alcove doors slammed against his fingers.

**RESPONSE:** Objection. This Request has no relevance to Plaintiff's claims, requests information beyond the scope of rule 26, and is not designed to lead to the discovery of admissible evidence.

15. After the injury to inmate Joshua Hudson, maintenance repair [sic] both east and west alcove doors to be self closing.

**RESPONSE:** Objection. See response to No. 14. Without waiving this objection it is denied.

16. SCI Food Service staff does not maintain certification records of frequent and regular inspection of the main kitchen, food and equipment to be made.

**RESPONSE:** Denied.

17. When inmate workers make verbal complaints about excessive heat and/or extreme cold, Food Service staff makes no general assessment of the inmate complaint before notifying Food Service Director or DOC maintenance.

**RESPONSE:** Defendant is without sufficient knowledge to admit or deny.

18. Inmate kitchen workers are told to drink plenty of water and and [sic] given breaks when temperature at the SCI main kitchen rise and/or exceeds 100 degree [sic].

**RESPONSE:** Defendant is without sufficient knowledge to admit or deny.

19. There is only one (1) toilet seat for the use of 22-25 inmate kitchen workers per shift.

**RESPONSE:** Admitted.

20. The Food Service staff office and Food Service Director Chris Senato office at the SCI main kitchen are both equip [sic] with air condition units.

**RESPONSE:** Admitted.

**STATE OF DELAWARE  
DEPARTMENT OF JUSTICE**

/s/ Catherine Damavandi  
Catherine Damavandi, ID#3823  
Deputy Attorney General  
Department of Justice  
Carvel State Bldg., 6<sup>th</sup> Fl.,  
820 N. French Street  
Wilmington, DE 19801

Dated: November 26, 2007

***CERTIFICATE OF SERVICE***

I hereby certify that on November 26, 2007, I electronically filed the attached *Defendant Steven Rayner's Response to Plaintiff's Request for Admissions* with the Clerk of Court using CM/ECF. I hereby certify that on November 26, 2007, I have mailed by United States Postal Service, the document to the non-registered parties on the attached list.

STATE OF DELAWARE  
DEPARTMENT OF JUSTICE

/s/ Catherine Damavandi  
Catherine Damavandi, ID#3823  
Deputy Attorney General  
Department of Justice  
Carvel State Bldg., 6<sup>th</sup> Fl.,  
820 N. French Street  
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**Service List of Non-Registered Parties**

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